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Attorneys for Greenwich Associates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	Chapter 11
In re	:	
	:	
LEHMAN BROTHERS HOLDINGS INC.,	:	Case No.: 08-13555 (JMP)
et al.,	:	
	:	
Debtor	:	
	:	
-----X	:	

**OBJECTION OF GREENWICH ASSOCIATES TO DEBTOR'S PROPOSED CURE
AMOUNT FOR ASSUMPTION AND ASSIGNMENT OF CONTRACTS**

Greenwich Associates ("GA"), a party to a "Non-IT Closing Date Contract" proposed to be assumed and assigned by the Debtor to Barclays Capital, Inc., objects as follows to the Cure Amount asserted by the Debtor with respect to GA's contracts:

1. The Debtor's proposed cure amount is \$176,900, which relates to GA's Invoice No. 33005. Although the amount of that invoice is accurate and remains unpaid, there is another outstanding invoice (No. 33179) in the amount of \$466,000, which relates to the same agreement between GA and Lehman Brothers, Inc.

2. Attached are true copies of Invoice No. 33005 and Invoice No. 33179.

3. Separately, it is unclear from the Debtor's papers whether the Debtor intends to assume the other agreements it has with GA. The outstanding invoices related to those contracts total \$61,500. (Specifically, Invoice No. 33229 for \$6,500 and Invoice No. 33306 for \$55,000.)

WHEREFORE, GA respectfully requests that the Court condition any assumption and assignment of the Non-IT Closing Date Contract(s) on the immediate payment of the outstanding amount due to GA under such agreements, and grant such other and further relief as the Court deems just and proper.

Dated: October 2, 2008

LEVETT ROCKWOOD P.C.

By: /s/ Robert Laplace
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CERTIFICATION OF SERVICE

This is to certify that on the 2nd day of October, 2008, a copy of the foregoing ***Objection of Greenwich Associates to Debtor's Proposed Cure Amount for Assumption and Assignment of Contracts*** was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system. A copy of the foregoing was also mailed to the following parties via first-class mail, postage prepaid:

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/s/ Robert Laplaca

Robert Laplaca